

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In Re:	*	Case No. 24-31033
	*	Judge John Gustafson
YZ Enterprises Inc.	*	Chapter 11 Proceeding
	*	
	*	
Debtor	*	

**NOTICE OF FILING OF BUDGET AND PROPOSED ORDER IN SUPPORT OF THE
FURTHER HEARING ON THE MOTION OF THE DEBTOR, YZ ENTERPRISES, INC., FOR
THE ENTRY OF A FURTHER INTERIM ORDER TO USE CASH COLLATERAL
PURSUANT TO 11 U.S.C. § 363, TO SET ADEQUATE PROTECTION PAYMENT PURSUANT
TO 11 U.S.C. § 361 AND TO APPROVE BUDGET**

Now comes YZ Enterprises Inc., the Debtor and Debtor-in-Possession, and hereby files this Notice of the Filing of a Budget and Proposed Order in Support of the Further Hearing Set by the Court on the Motion of the Debtor, YZ Enterprises, for the Entry of a Further Interim Order to Use Cash Collateral Pursuant to 11 U.S.C. § 363, to Set Adequate Protection Payment pursuant to 11 U.S.C. § 361 and to Approve Budget.

The Further Hearing has been set by the Court for December 19, 2024, at 2:00 p.m. (Doc. No. 89). Attached hereto as Exhibit A is the proposed budget for which the Debtor will seek approval. Attached hereto as Exhibit B is the proposed order the Debtor will seek to have the Court enter. Said proposed Order is marked up to show the changes made from the prior order.

Respectfully submitted

/s/Eric R. Neuman
Eric R. Neuman (0069794)
DILLER & RICE
Attorney for Debtor

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CERTIFICATION

I, Eric Neuman, do hereby certify that a copy of this Notice was sent this 18th day of December 2024,
to the list of creditors and/or interested parties listed below.

/s/Eric R. Neuman
Eric R. Neuman

Notice will be electronically mailed to:

- Kimberly Ross Clayson kclayson@taftlaw.com
- Dov Y. Frankel dfrankel@taftlaw.com,
docket@taftlaw.com;welcht@taftlaw.com;horvath@taftlaw.com
- Patricia B. Fugee patricia.fugee@fisherbroyles.com, cpbf11@trustesolutions.net
- Bruce J.L. Lowe blowe@taftlaw.com,
CLE_Docket_Assist@taftlaw.com;SMcKean@taftlaw.com
- Spencer Lutz spencer.lutz@usdoj.gov
- Eric R. Neuman eric@drlawllc.com,
kim@drlawllc.com;r50765@notify.bestcase.com;raymond@drlawllc.com;jennifer@drlawllc.com
- United States Trustee (Registered address)@usdoj.gov
- Kurt F Vote kvote@wjhattorneys.com
- Bradley R. Waugh pommeranz@maf-law.com, farell@maf-law.com

Notice will be mailed to:

Franklin Capital Holdings LLC
600 Central Ave Suite 212
Highland Park, IL 60035

Unique Funding Solutions
71 S Central Ave Valley
Stream, NY 11580

US Small Business Administration
District Counsel
1350 Euclid Avenue, Suite 211
Cleveland, OH 44121-5000

